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Attorneys for Plaintiffs  
 Ray Strong, et. al.

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

RAY STRONG, et al., on behalf of  
 himself and all similarly situated  
 individuals,

Plaintiffs,

vs.

C & H SUGAR COMPANY, INC.;  
 AMERICAN SUGAR REFINING, INC.;  
 and DOES 1-100 inclusive

Defendants.

Case No.: 3:17-cv-00480-RS

[CLASS ACTION & COLLECTIVE  
 ACTION]

**NOTICE OF PLAINTIFF'S UNOPPOSED  
 MOTION FOR (1) CONDITIONAL  
 CERTIFICATION (2) PRELIMINARY  
 APPROVAL CERTIFYING CLASS; (3)  
 CERTIFICATION OF COLLECTIVE  
 AND CLASS REPRESENTATIVE; (4)  
 APPOINTMENT OF COLLECTIVE AND  
 CLASS COUNSEL; (5) PRELIMINARY  
 APPROVAL OF SETTLEMENT AND  
 NOTICE THEREOF; (6) SETTING  
 SCHEDULE FOR FINAL APPROVAL  
 OF SETTLEMENT;**

Date: August 16, 2018

Time: 1:30 p.m.

Courtroom: 3, 17th Floor

Judge: Hon. Richard Seeborg

TO ALL PARTIES AND THEIR ATTORNEY(S) OF RECORD:

NOTICE IS HEREBY GIVEN that on August 16, 2018, at 1:30 p.m. in Courtroom 3 of the  
 above entitled Court, before the Honorable Richard Seeborg, Plaintiff Ray Strong moves, and

Defendants C & H Sugar Company, Inc. and American Sugar Refining, Inc. do not oppose, that the Court issue an order as to the following:

- (1) Find that Plaintiff is similarly situated to the members of the FLSA Collective Action and subclasses defined herein to warrant conditional certification of this action pursuant to 29 U.S.C. 216(b) for the purposes of the proposed settlement;
- (2) Find that the California Class and the sub-classes defined herein warrant preliminary certification pursuant to Federal Rule of Civil Procedure Rule 23 for purposes of the proposed settlement;
- (3) Certify Plaintiff Ray Strong as the Collective Action and Class Representative;
- (4) Appoint Mastagni Holstedt, A.P.C. as Collective Action & Class Counsel;
- (5) Preliminarily approve the proposed settlement;
- (6) Approve, and direct the mailing of the proposed Class Forms (Class Notice, Claim Forms, and Opt-Out Form) in accordance with the Parties proposed timeline;
- (7) Schedule a fairness hearing on the question of whether the proposed settlement should be finally approved as fair, reasonable, and adequate as to the members of the Collective Action Class and California Class (and sub-classes thereof).

This motion is based on the Complaint, the proposed Settlement Agreement and notice documents therewith, Memorandum of Points and Authorities, the Declarations in support of this motion; the other records, pleadings, and papers filed in this action; and upon such other documentary and oral evidence or argument as may be presented to the Court at the hearing of this motion or in the Court's discretion resolved without oral argument.

Respectfully submitted,

Dated: June 29, 2018

**MASTAGNI HOLSTEDT, APC**

By: /s/ Ace T. Tate  
 DAVID E. MASTAGNI  
 ISAAC S. STEVENS  
 ACE T. TATE  
 Attorneys for Plaintiffs